

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

**AMENDED² NOTICE OF AGENDA FOR
HEARING ON JUNE 17, 2025 AT 11:00 A.M. (ET)³**

*This proceeding is going forward as a status conference and
will be conducted remotely via Zoom.*

Please refer to Judge Shannon's Chambers Procedures
(<https://www.deb.uscourts.gov/judge-brendan-l-shannon>) and the
Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>)
for information on the method of allowed participation (video or audio),
Judge Shannon's expectations of remote participants,
and the advance registration requirements.

**Registration is required by 4:00 p.m. (ET) the business day
before the hearing unless otherwise noticed using the
eCourtAppearances tool available on the Court's website.**

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors' headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

² Amended items appear in bold.

³ All motions and other pleadings referenced herein are available online at the following address:
<https://cases.stretto.com/momca>.

MATTERS GOING FORWARD:

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 8](#) – filed on March 11, 2025]

Response/Objection Deadline: June 13, 2025 at 11:59 p.m. (ET).

Responses Received:

- i. Omnibus Limited Objection and Reservation of Rights of Mohammad Honarkar and 4G Wireless, Inc. to First Day Motions [[Docket No. 31](#) – filed on March 13, 2025]
- ii. Objection of Enterprise Bank & Trust to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 40](#) – filed on March 13, 2025]
- iii. Lone Oak Fund, LLC's Limited Objection and Reservation of Rights to the Debtors' Motion for Entry of Final Order (I) Authorizing Use of Post-Petition Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [[Docket No. 107](#) – filed on March 24, 2025]
- iv. Wilshire Quinn Income Fund, LLC's Objection to the Debtors' Motion for Entry of Final Orders (I) Authorizing Use of Post-Petition Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [[Docket No. 110](#) – filed on March 24, 2025]
- v. Preferred Bank's Objection to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 128](#) – filed on March 26, 2025]

Related Documents:

- a. Declaration of Mark Shinderman in Support of Petitions and First Day Motions [[Docket No. 11](#) – filed on March 11, 2025]
- b. Notice of Filing of 13 Week Cash Flow Budgets [[Docket No. 135](#) – filed on March 27, 2025]

- c. Amended Declaration of Mark Shinderman in Support of Petitions and First Day Motions [[Docket No. 152](#) – filed on March 28, 2025]
- d. Notice of Filing of Updated FTI Report Dated April 7, 2025 [[Docket No. 207](#) – filed on April 10, 2025]
- e. Fifth Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [[Docket No. 524](#) – entered on June 11, 2025]

Status: The Debtors intend to present a further interim order in advance of or at the hearing.

This matter is going forward as a status conference.

- 2. Motion of Debtors for Entry of an Order (A)(I) Approving Bidding Procedures for Tesoro Property, (II) Scheduling the Bid Deadlines, (III) Scheduling Hearings and Objection Deadlines with Respect to the Sale of the Tesoro Property, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Contract Assumption and Assignment Procedures, and (VI) Granting Related Relief; and (B)(I) Approving the Sale of the Tesoro Property Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[Docket No. 280](#) – filed on April 22, 2025]

Response/Objection Deadline: Sale Objection Deadline: May 30, 2025 at 4:00 p.m. (ET)

Purchaser Objection Deadline: June 4, 2025 at 4:00 p.m. (ET)

Responses Received:

- i. Preferred Bank's Limited Objection to Debtors' Motion for Entry of Orders (A)(I) Approving Bidding Procedures for Tesoro Property, (II) Scheduling the Bid Deadlines, (III) Scheduling Hearings and Objection Deadlines with Respect to the Sale of the Tesoro Property, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Contract Assumption and Assignment Procedures, and (VI) Granting Related Relief; and (B)(I) Approving the Sale of Tesoro Property Free and Clear of all Interests, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[Docket No. 451](#) – filed on May 27, 2025]
- ii. 363 Objection of Mohammad Honarkar and 4G Wireless, Inc. to Tesoro Sale Motion and Request to Adjourn Sale Hearing [[Docket No. 460](#) – filed on May 30, 2025]
- iii. Objection of Mohammad Honarkar and 4G Wireless, Inc. to Tesoro Sale [[Docket No. 483](#) – filed on June 4, 2025]

- iv. [SEALED] Notice of Filing Sealed Version of Exhibit A to Objection of Mohammad Honarkar and 4G Wireless, Inc. to Tesoro Sale [[Docket No. 484](#) – filed on June 4, 2025]
- v. Nano Banc’s Response to Objection of Mohammad Honarkar and 4G Wireless, Inc. to Tesoro Sale [[Docket No. 505](#) – filed on June 9, 2025]
- vi. Notice of Filing Proposed Redacted Version of Exhibit A to Objection of Mohammad Honarkar and 4G Wireless, Inc. to Tesoro Sale [[Docket No. 511](#) – filed on June 9, 2025]
- vii. Informal comments from the U.S. Trustee.

Related Documents:

- a. Notice of Motion of Debtors for Entry of an Order (A)(I) Approving Bidding Procedures for Tesoro Property, (II) Scheduling the Bid Deadlines, (III) Scheduling Hearings and Objection Deadlines with Respect to the Sale of the Tesoro Property, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Contract Assumption and Assignment Procedures, and (VI) Granting Related Relief; and (B)(I) Approving the Sale of the Tesoro Property Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[Docket No. 295](#) – filed on April 24, 2025]
- b. Order (I) Approving Bidding Procedures; (II) Scheduling the Bid Deadlines; (III) Scheduling Hearings and Objection Deadlines with Respect to the Sale of Tesoro Property; (IV) Approving the Form and Manner of Notice Thereof; (V) Approving Contract Assumption and Assignment Procedures; and (VI) Granting Related Relief [[Docket No. 402](#) – entered on May 15, 2025]
- c. Notice of Sale, Bidding Procedures, and Sale Hearing for Tesoro Property [[Docket No. 409](#) – filed on May 19, 2025]
- d. Notice of Filing of Order (I) Approving The Sale of the Tesoro Property Free And Clear of All Interests, (II) Approving Assumption and Assignment Of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [[Docket No. 456](#) – filed on May 27, 2025]
- e. Notice of Successful Bidder With Respect to the Tesoro Property [[Docket No. 468](#) – filed on June 2, 2025]
- f. Declaration of Mark Shinderman in Support of Sale of the Tesoro Property, the Global Sale Procedures Motion, and Motion to Reject Honarkar Agreements [[Docket No. 492](#) – filed on June 5, 2025]

- g. Declaration of Jeffrey Azuse in Support of the Sale of Tesoro Property [[Docket No. 493](#) – filed on June 5, 2025]
- h. [SEALED] Debtors’ Reply in Support of the Debtors’ Tesoro Sale Motion [[Docket No. 500](#) – filed on June 6, 2025]
- i. [REDACTED] Debtors’ Reply in Support of the Debtors’ Tesoro Sale Motion [[Docket No. 501](#) – filed on June 6, 2025]
- j. Declaration of Patrick Theodora in Support of the Sale of Tesoro Property [[Docket No. 509](#) – filed on June 9, 2025]
- k. Notice of Filing of Unredacted Version of Debtors’ Reply in Support of the Debtors’ Tesoro Sale Motion [[Docket No. 523](#) – filed on June 10, 2025]

Status: The informal comments of the U.S. Trustee and the objection filed by Preferred Bank have been resolved by revisions to the proposed order. The Debtors intend to present the revised proposed order in advance of or at the hearing. **This matter is going forward as a status conference.**

- 3. Debtors’ Motion for Order (I) Establishing Procedures for the (A) Sale of Real Estate Free and Clear of all Liens, Claims, Encumbrances, and Other Interests; (B) Assumption and Assignment of Executory Contracts and Unexpired Leases of Non-Residential Real Property; and (II) Granting Related Relief [[Docket No. 394](#) – filed on May 13, 2025]

Response/Objection Deadline: May 27, 2025 at 4:00 p.m. (ET).

Responses Received:

- i. Limited Objection of Dauntless Capital Partners to Debtors’ Motion for Order (I) Establishing Procedures for the (A) Sale of Real Estate Free and Clear of all Liens, Claims, Encumbrances, and Other Interests; (B) Assumption and Assignment of Executory Contracts and Unexpired Leases of Non-Residential Real Property; and (II) Granting Related Relief [[Docket No. 452](#) – filed on May 27, 2025]
- ii. Objection of Mohammad Honarkar and 4G Wireless, Inc. to Debtors’ Motion for Order (I) Establishing Procedures for the (A) Sale of Real Estate Free and Clear of all Liens, Claims, Encumbrances, and Other Interests; (B) Assumption and Assignment of Executory Contracts and Unexpired Leases of Non-Residential Real Property; and (II) Granting Related Relief [[Docket No. 455](#) – filed on May 27, 2025]
- iii. Informal comments from the U.S. Trustee.

Related Documents:

- a. Declaration of Jeffrey Azuse in Support of the Debtors' Sale Procedures Motion [[Docket No. 489](#) – filed on June 4, 2025]
- b. Debtors' Reply in Support of Global Sale Procedures Motion [[Docket No. 490](#) – filed on June 4, 2025]
- c. Notice of Revised Order (I) Establishing Procedures for the (A) Sale of Real Estate Free and Clear of all Liens, Claims, Encumbrances, and Other Interests; (B) Assumption and Assignment of Executory Contracts and Unexpired Leases of Non-Residential Real Property; and (II) Granting Related Relief [[Docket No. 491](#) – filed on June 5, 2025]
- d. Declaration of Mark Shinderman in Support of Sale of the Tesoro Property, the Global Sale Procedures Motion, and Motion to Reject Honarkar Agreements [[Docket No. 492](#) – filed on June 5, 2025]
- e. Witness and Exhibit List of Mohammad Honarkar and 4G Wireless, Inc. for Hearing Set for June 10, 2025 at 10:00 a.m. (ET) [[Docket No. 512](#) – filed on June 9, 2025]

Status: The limited objection filed by Dauntless Capital Partners and the informal comments of the U.S. Trustee have been resolved by the filing of the revised proposed order. **This matter is going forward as a status conference.**

Dated: June 16, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Aaron H. Stulman

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